

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**ROBERT HARRIS, ET AL.**

**PLAINTIFFS**

**VS.**

**CIVIL ACTION NO.: 3:22-CV-00479-TSL-MTP**

**SAM DOBBINS, ET AL.**

**DEFENDANTS**

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**Declaration of Robin McCrory**

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I, Robin McCrory, am over the age of 18, am of sound mind, and declare as follows:

1. I am currently serving my fourth term as Mayor of Lexington, Mississippi.
2. Lexington operates under a Mayor/Board of Aldermen form of government. The current board, as of July 2021, is comprised of the following: Walter Pitchford (B), Joshua Davis (B), Richard Spencer (W), Charles Simmons (B), and Clementine Cooper (B).
3. In July 2021, Sam Dobbins was appointed police chief by a 4-to-1 board vote. Alderwoman Cooper was the dissenting vote.
4. At the time Dobbins was appointed, crime in Lexington was rampant. Gunshots commonly were heard throughout the day and at night. Cars would drag race in the city limits without regard for traffic laws or safety.
5. Following Dobbins appointment, I began receiving citizen complaints about the police department. One complaint was received via a text from Francine Jefferson in March 2022. The text indicated that that she was "preparing to bring as much outside help as possible, including NAACP & ACLU[.]"
6. Later, I heard that Attorney Jill Jefferson began attending Lexington Municipal Court proceedings. I was told that Attorney Jefferson was involved in an altercation with Municipal Judge Marc Boutwell after Attorney Jefferson had interfered with court proceedings.

7. I also witnessed Attorney Jefferson attend board of aldermen meetings along with camerapersons who I understood to be members of the media.

8. The City has received various public records requests since March 2022 related to the police department.

9. In July 2022, I was informed of a recording in which Dobbins used offensive language and the N-word. After learning about the recording, I suspended Dobbins.

10. A special meeting was called, and Dobbins was terminated by a 3-to-2 board vote. Board members Simmons and Spencer voted against terminating Dobbins. At the same meeting, Charles Henderson was appointed Interim Police Chief by a 4-to-1 board vote. Board member Cooper voted against Henderson's appointment.

11. To my knowledge, Dobbins has not patrolled Lexington in any Lexington patrol car following his termination.

12. There are complaint forms located at City Hall and the Police Department by which citizens can (and do) lodge complaints against the police department.

13. All of the above is true and correct to the best of my knowledge and belief.

Executed this 7<sup>th</sup> day of September, 2022.

  
Robin McCrory